

UNITED STATES COURT OF APPEALS
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

X
MASTER DOCKET NO.:
21MC102 (AKH)

NOTICE OF CROSS APPEAL

X

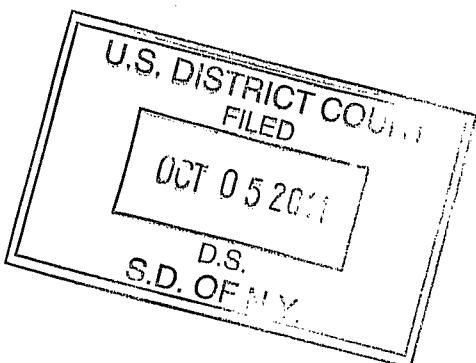
PLEASE TAKE NOTICE that the Tier 4 Plaintiffs listed in the Annexed Addendum A hereby Cross Appeal to the United States Court of Appeals for the Second Circuit from the September 8, 2011 Order (Docket No. 4093 in 21MC102) that overruled Defendants' Objections to the Court's December 30, 2010 Orders and *sua sponte* Ordered without notice to the parties or counsel or an opportunity for briefing that Plaintiffs' Counsel may not take their attorneys' fees on the so-called "Contingent" Payments resulting from the District Court's Orders of December 30, 2010 and September 8, 2011.

Dated: New York, New York
October 4, 2011

WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Counsel for Multiple Plaintiffs


Denise A. Rubin (DR5591)

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21MC102

No.	Last Name	First Name	Primary Docket	No.	Last Name	First Name	Primary Docket
1	Alvarez	Gloria	07cv11017	58	Rejment	Jan	08CV11455
2	Bastidas	Julio	07CV05276	59	Rendon	Guelmer	07cv04510
3	Bedkowski	Tadeusz	07CV05337	60	Rivera	Sonia	06cv06234
4	Bierylo	Jan	07CV05393	61	Roberts	Bobby	07CV05382
5	Bunay	Cruz	07cv04457	62	Rodriguez	Mirian	08CV02702
6	Calle	Elva	08CV02584	63	Rojas	Mario	06cv05786
7	Calle	Maria Rocio	07cv04458	64	Rozpedowski	Jerzy	07cv08285
8	Campuzano	Consuelo	06cv14529	65	Ruiz	Arley	07CV05317
9	Cantos	Ana Patricia	05CV01272	66	Sabo-Winer	Galit	06cv01651
10	Cardona	Luz	05CV00417	67	Salazar	Maria	07CV01699
11	Carvajal	Javier	06CV08348	68	Sanchez	Delta	07cv08286
12	Castillo	Piedad	05CV10743	69	Sanchez	Jose	07cv04513
13	Cayetano	Teresita	07CV05282	70	Sanchez	Juan	07cv05318
14	Chique	Manuel	08CV02600	71	Sanchez	Wilson	07CV05386
15	Chojnowski	Andrzej	07CV01588	72	Santos	Fernanda	07CV05319
16	Colorado	Viviana	08CV02239	73	Siemek	Andrzej	07cv01704
17	Dabrowski	Mieczyslaw	07CV05283	74	Slesicki	Jerzy	06cv06814
18	Davila	Flora	07cv04463	75	Suco	Norma	07cv01708
19	Delacruz	Gloria	07CV01599	76	Sullivan	Margaret	06cv14139
20	Drozdz	Dominik	06cv14619	77	Tabares	Ljiljana	07cv08289
21	Fisco	Gregory	07CV05289	78	Tenezaca	Manuel	07CV05321
22	Galiano	Cruz	08CV02622	79	Tighe	Stephen	06cv15091
23	Galli	Diana	07cv04503	80	Torres	Miguel	07cv04519
24	Galvis	Edgar	06cv03422	81	Vega	Myriam	06CV12221
25	Garcia	Carlos	08CV02624	82	Villa	Virginia	06cv15118
26	Gil	Claudia	08CV02625	83	Wolkowicz	Jan	07cv01728
27	Gonzalez	Roberta	07CV04245	84	Yumbla	Alcibar	07cv01729
28	Grabowska	Malgorzata	06cv04885	85	Zalewski	Krzysztof	07CV05330
29	Guzman	Felix	07CV05412	86	Zamora	Carlos	07cv01549
30	Intriago	Ecuador	07cv04475	87	Zamora	Jairo	08CV02741
31	Jalil	Julio	07cv04476				
32	Johnson	Charles	07CV05558				
33	Juarez	Osman	07CV04970				
34	Karpinski	Slawomir	07CV01634				
35	Kopcza	Michal	07CV05396				
36	Korzep	Andrzej	08CV02642				
37	Kwasniak	Boguslaw	07CV05300				
38	Lampart	Antoni	07CV01645				
39	Litura	Manuel	07CV01649				
40	Lopez	Adolfo	10cv07154				
41	Manco	Luz	08CV02654				
42	Marcillo	Douglas	07cv04486				
43	Mayorga Gonzalez	Julio Cesar	08CV02656				
44	Medrano	Salvador	07cv04492				
45	Medrano	Trinidad	07cv04493				
46	Montalvo	Luz	08CV02660				
47	Morales	Fabio	07CV01667				
48	Morales	Segundo	07CV01668				
49	Munoz	Janeth	08CV02665				
50	Naranjo	Angel	07CV01671				
51	Narvaez	Julia	07CV05304				
52	Naula	Miguel	08CV02671				
53	Perkowski	Kazimierz	06CV08278				
54	Peski	Slawomir	08CV02688				
55	Pietraszkiewicz	Jan	06cv02527				
56	Pino	Fernando	08CV02245				
57	Porowski	Piotr	06cv03850				

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

DOCKET No.: 21MC102(AKH)
DECLARATION OF SERVICE

-----X

DENISE A. RUBIN, an Attorney duly licensed to practice before the Courts of the State of New York and a member of the Bar of this Honorable Court, hereby Declares under penalty of perjury:

On October 4, 2011, I duly served a true copy of the within NOTICE OF CROSS APPEAL on the persons listed below by e-mail transmission.

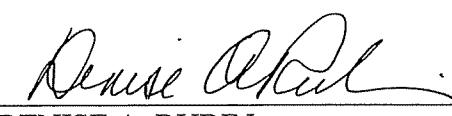
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DENISE A. RUBIN

UNITED STATES DISTRICT COURT
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DECLARATION OF SERVICE

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PLAINTIFFS' NOTICE OF CROSS APPEAL

WORBY GRONER EDELMAN & NAPOLI BERN, LLP

Counsel for: Plaintiffs
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(212) 267-3700

The undersigned attorney hereby certifies, pursuant to Fed. R. Civ. P. 11 and 22 NYCRR §130-1.1-a, that I have read the within papers and that to the best of my knowledge and belief they are not frivolous as that term is defined in 22 NYCRR § 130-1.1(c) and Fed. R. Civ. P. 11.



Attorney name: Denise A. Rubin

PLEASE TAKE NOTICE:

NOTICE OF ENTRY

that the within is a (certified) true copy of an _____
of the clerk of the within named court on _____
duly entered in the office _____
200 _____.

NOTICE OF SETTLEMENT

that an order _____
presented for settlement to the HON. _____
within named Court, at _____
on _____
of which the within is a true copy, will be
one of the judges of the _____
200 _____. at _____ O'clock _____.M.

Dated, _____

Yours, etc.

WORBY GRONER EDELMAN & NAPOLI BERN, LLP